

ORIGINAL

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Attorneys for Plaintiffs  
BRADEN PARTNERS, LP and  
TEIJIN PHARMA USA, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MEJ

BRADEN PARTNERS, LP, d/b/a PACIFIC  
PULMONARY SERVICES, a California  
limited partnership, and TEIJIN PHARMA  
USA, LLC, d/b/a PACIFIC PULMONARY  
SERVICES, a Delaware limited liability  
company;

Plaintiffs,

v.

TWIN CITY FIRE INSURANCE COMPANY,  
a Connecticut corporation;

Defendant.

CV Case No. 14 1689

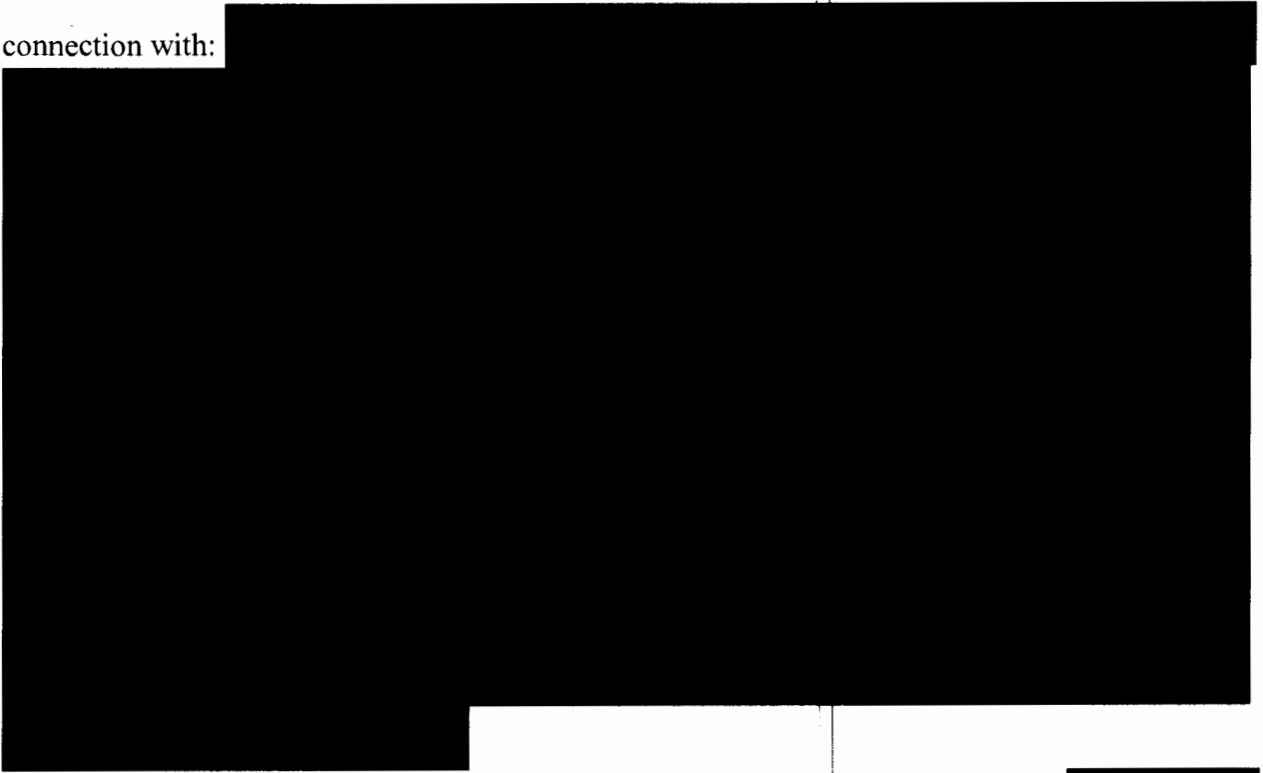
REDACTED

BRADEN PARTNERS, LP'S AND  
TEIJIN PHARMA USA, LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL RE COMPLAINT FOR  
DECLARATORY RELIEF, BREACH  
OF CONTRACT, AND BREACH OF  
COVENANT OF GOOD FAITH AND  
FAIR DEALING


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1 Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiffs Braden Partners, LP, doing  
2 business as Pacific Pulmonary Services ("Pacific Pulmonary Services") and Teijin Pharma USA,  
3 LLC (together, "Plaintiffs"), respectfully submit this Administrative Motion for Leave to File  
4 Under Seal (the "Administrative Motion") portions of Plaintiffs' Complaint for Declaratory  
5 Relief, Breach of Contract, and Breach of the Covenant of Good Faith and Fair Dealing (the  
6 "Complaint"), the Administrative Motion, filed concurrently with the Complaint, and the  
7 Declaration of Darren S. Teshima, filed in support of the Administrative Motion.

8 The Complaint, Administrative Motion, and Teshima Declaration contain confidential  
9 information that must be sealed from the public record. Specifically, the Complaint alleges that  
10 defendant Twin City Fire Insurance Company ("Twin City") breached its contractual obligations  
11 to Plaintiffs by wrongfully denying coverage and refusing to advance defense costs to Plaintiffs in  
12 connection with:



24 Federal law requires that the Claim must be sealed from the public record.

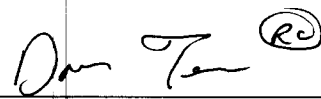




Because the Complaint, Administrative Motion, and Teshima Declaration discuss the specific content and existence of the Claim, the Court should grant Plaintiffs' Administrative Motion. Pursuant to Civil Local Rule 79-5, Plaintiffs will lodge full copies of the Insurance Complaint, Administrative Motion and Teshima Declaration, and redacted versions of the documents that can be filed into the public record if the Court grants the sealing order.

Dated: April 10, 2014

DARREN S. TESHIMA  
ROLAND CHANG  
Orrick, Herrington & Sutcliffe LLP

By:   
DARREN S. TESHIMA  
Attorneys for Plaintiffs  
BRADEN PARTNERS, LP and  
TEIJIN PHARMA USA, LLC